

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

UNITED STATES OF AMERICA)	Crim. No. <u>2:22-cr-00032</u>
)	
)	18 U.S.C. § 922(g)(1)
)	18 U.S.C. § 924(a)(2)
)	18 U.S.C. § 924(c)(1)(A)(i)
v.)	18 U.S.C. § 924(e)
)	18 U.S.C. § 924(d)(1)
)	21 U.S.C. § 841(a)(1)
)	21 U.S.C. § 841(b)(1)(C)
)	21 U.S.C. § 853
)	21 U.S.C. § 881
)	28 U.S.C. § 2461(c)
ALONZO MARKELL JENKINS)	INDICTMENT

COUNT 1

THE GRAND JURY CHARGES:

That on or about April 11, 2019, in the District of South Carolina, the Defendant, **ALONZO MARKELL JENKINS**, knowingly possessed a firearm and ammunition in and affecting commerce, to wit, a Smith & Wesson 9mm pistol and 9mm ammunition, having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 2

THE GRAND JURY FURTHER CHARGES:

That on or about April 11, 2019, in the District of South Carolina, the Defendant, **ALONZO MARKELL JENKINS**, knowingly, intentionally and unlawfully did possess with intent to distribute a quantity of cocaine base (commonly known as “crack cocaine”) and a quantity of a mixture or substance containing a detectable amount of methamphetamine, both Schedule II controlled substances;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 3

THE GRAND JURY FURTHER CHARGES:

That one or about April 11, 2019, in the District of South Carolina, the Defendant, **ALONZO MARKELL JENKINS**, knowingly used and carried firearm during and in relation to, and did possess firearms in furtherance of, a drug trafficking crime, as outlined in Count 2, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 4

THE GRAND JURY FURTHER CHARGES:

That on or about April 16, 2020, in the District of South Carolina, the Defendant, **ALONZO MARKELL JENKINS**, knowingly possessed firearms and ammunition in and affecting commerce, to wit, a Glock, model 22, .40 caliber pistol; a PSA multi caliber rifle; a PSA multi caliber pistol; a Taurus, model Judge, .45 caliber revolver; a Maverick Arms, Model 88, 12 gauge shotgun; a Romarm/Cugir Micro Draco 7.62x39mm pistol; a Smith & Wesson,

Model 60, .38 caliber revolver; a Smith & Wesson, model M&P Shield, .380 caliber pistol;—a Taurus, model PT140 Millennium G2, .40 caliber pistol; .40 caliber ammunition; 7.62x39mm ammunition; and 410 gauge shotgun shells, having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 5

THE GRAND JURY FURTHER CHARGES:

That on or about April 16, 2020, in the District of South Carolina, the Defendant, **ALONZO MARKELL JENKINS**, knowingly, intentionally and unlawfully did possess with intent to distribute a quantity of a mixture or substance containing a detectable amount of methamphetamine and hydrocodone, both Schedule II controlled substances;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 6

THE GRAND JURY FURTHER CHARGES:

That one or about April 16, 2020, in the District of South Carolina, the Defendant, **ALONZO MARKELL JENKINS**, knowingly used and carried a firearms during and in relation to, and did possess a firearm in furtherance of, a drug trafficking crime, as outlined in Count 5, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 7

THE GRAND JURY FURTHER CHARGES:

That on or about November 4, 2020, in the District of South Carolina, the Defendant, **ALONZO MARKELL JENKINS**, knowingly possessed firearms and ammunition in and affecting commerce, to wit, a Glock, model 30S, .45 caliber pistol; a Glock, model 43, 9mm pistol; .45 caliber ammunition; 9mm ammunition; and .223 caliber ammunition, having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 8

THE GRAND JURY FURTHER CHARGES:

That on or about November 4, 2020, in the District of South Carolina, the Defendant, **ALONZO MARKELL JENKINS**, knowingly, intentionally and unlawfully did possess with intent to distribute a quantity of cocaine base (commonly known as “crack cocaine”) and a quantity of a mixture or substance containing a detectable amount of methamphetamine, both Schedule II controlled substances;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 9

THE GRAND JURY FURTHER CHARGES:

That one or about November 4, 2020, in the District of South Carolina, the Defendant, **ALONZO MARKELL JENKINS**, knowingly used and carried a firearm during and in relation to, and did possess a firearm in furtherance of, a drug trafficking crime, as outlined in Count 8,

which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

FORFEITURE

FIREARM/DRUG OFFENSES:

Upon conviction for one or more felony violations of Title 18 and Title 21, United States Code as charged in this Indictment, the Defendant, **ALONZO MARKELL JENKINS**, shall forfeit to the United States all of the Defendant's rights, title, and interest in and to any property, real and personal,

- (a) constituting, or derived from any proceeds the Defendant obtained, directly or indirectly, as the result of such violation(s) of Title 21, United States Code, and all property traceable to such property
- (b) used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations of Title 21, United States Code;
- (c) any firearms and ammunition (as defined in 18 U.S.C. § 921) –
 - (1) used or intended to be used to facilitate the transportation, sale, receipt, possession or concealment of controlled substances or any proceeds traceable to such property;
 - (2) involved in or used in any knowing violations of 18 U.S.C. §§ 922 or 924, or violation of any other criminal law of the United States, or intended to be used in a crime of violence.

PROPERTY:

Pursuant to Title 18, United States Code, Section 924(d)(1), Title 21, United States Code, Sections 853 and 881, and Title 28, United States Code, Section 2461(c), the property which is subject to forfeiture upon conviction of the Defendant for the offenses charged in this Indictment includes, but is not limited to, the following:

A. Firearms:

1. Glock, model 22, .40 caliber pistol
Serial Number: XNY906
2. PSA multi caliber rifle
Serial Number: HP023540
3. Maverick Arms, Model 88, 12 gauge shotgun
Serial Numbers: MV71115U
4. Taurus, model Judge, .45 caliber revolver
Serial Number: Unknown
5. Romarm/Cugir Micro Draco 7.62x39mm pistol
Serial Number: PMD-17052-19
6. Smith & Wesson, model 60, .38 caliber revolver
Serial Number: BKD1230
7. Smith & Wesson, model M&P Shield, .380 caliber pistol
Serial Number: NDN3723
8. Taurus, model PT140 Millennium G2, .40 caliber pistol
Serial Number: SGX98902
9. Glock, model 30S, .45 caliber pistol
Serial Number: YVW267
10. Glock, model 43, 9mm pistol with two magazines
Serial Number: ABTM232
11. Smith & Wesson 9mm pistol
Serial Number: Unknown
12. PSA multi caliber pistol
Serial Number: Unknown12

B. Ammunition/Magazines:

Miscellaneous rounds of 9mm, .40 caliber, 7.62x39mm, 410 gauge, .223 caliber and .45 caliber ammunition and firearm magazines

C. Forfeiture Judgment:

A sum of money equal to all property the Defendant obtained as a result of the drug offenses charged in the Indictment, and all interest and proceeds traceable thereto as a result of his violation of 21 U.S.C. § 841.

SUBSTITUTION OF ASSETS:

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the Defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty.

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of Defendant up to an amount equivalent to the value of the above-described forfeitable property;

Pursuant to Title 18, United States Code, Section 924(d)(1), Title 21, United States Code, Sections 853 and 881, and Title 28, United States Code, Section 2461(c).

A True BILL

FOREPERSON


COREY F. ELLIS (JCH)
UNITED STATES ATTORNEY